

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-cr-109-DPJ-FKB

TERRY GRASSAREE

**UNITED STATES' MOTION FOR A PROTECTIVE ORDER  
CONCERNING SENSITIVE DISCOVERY MATERIAL**

Comes now the United States of America, through its undersigned Assistant United States Attorney, and pursuant to Federal Rule of Criminal Procedure 16(d)(1), moves this Court for a protective order concerning sensitive discovery material in this case. The Government submits the following as grounds for this motion:

1. This case involves allegations that the Defendant accepted bribes in exchange for allowing an inmate to possess contraband in jail. Discovery materials the Government has and will produce pursuant to its discovery obligations under Federal Rule of Criminal Procedure 16 include banking information and personal identifying information (PII) of many individuals, some uncharged. Some of the individuals are potential government witnesses. Other materials of a sensitive and personal nature are also included in the discovery. The volume and format of these materials makes it infeasible to redact the information in every place it exists.

2. Additionally, certain of this information may prove relevant to the Defendant's preparation of his defense.

3. Accordingly, the Government requests that the Court enter a protective order that:

- a. Permits the Government to disclose unredacted discovery material to defense counsel, and
- b. Requires defense counsel:

- i. To use the items only as necessary to prepare and present his client's defense;
- ii. Not to leave the items in the control or custody of Defendant or of any person who is not a professional member of the defense team (e.g., attorneys, paralegals, legal assistants, and expert witnesses);
- iii. To retrieve from the Defendant's custody or control any discovery materials that have been given to him; and
- iv. To collect and return to the Government all paper and electronic copies of the items at the conclusion of the litigation in this case or, alternatively, to destroy those items and confirm their destruction to the Government.

4. Such a protective order will both provide defense counsel with needed access to discovery information and protect sensitive information. Therefore, the Government requests that such order be issued.

WHEREFORE, the United States requests that the Court issue a Protective Order.

Date: March 6, 2023

Respectfully submitted,

DARREN J. LAMARCA  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all ECF participant(s) of this record.

DATED Monday, March 06, 2023.

*s/Kimberly T. Purdie*  
KIMBERLY T. PURDIE  
Assistant United States Attorney